

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NOS.: 1:18-CR-47-RJC
1:18-CR-68-RJC
1:18-CR-88-RJC**

UNITED STATES OF AMERICA

v.

WANDA SKILLINGTON GREENE

DEFENDANT'S ADDENDUM TO SENTENCING MEMORANDUM

It has come to the attention of the undersigned counsel that in a separate case, Joe Wiseman has submitted a memorandum containing the assertion that he was somehow extorted into committing the offense to which he has pleaded guilty. (Case No. 1:19-CR-17-RJC, Doc. No. 28). This argument is baseless. It merits comment only because this allegation should have no bearing on Wanda's sentence.

Simply put, this accusation is divorced from the facts of this case. It fails to account, for example, for the fact that Mr. Wiseman bribed not only Wanda, but also Mr. Creighton and Ms. Stone. It likewise fails to account for the fact that Mr. Wiseman not only paid for, but also actively participated in several pleasure trips. It fails to explain, for example, why Mr. Wiseman elected to travel to far off destinations such as Cartagena and Vienna. Nor does it account for other offense conduct, such as Mssrs. Creighton and Wiseman obtaining and using false identification cards in each

others' names. One memory that stands out in Wanda's mind, which contrasts with the picture Mr. Wiseman is now attempting to paint, is that of, Mssrs. Wiseman and Creighton purchasing several club memberships at Napa wineries and constantly researching where to go and what to drink.

Most surprising is the assertion that the Factual Basis document in Wanda's somehow proves that Wanda extorted Mr. Wiseman. Suffice it to say that Mr. Wiseman is interpreting this document in a way that was not intended by Wanda, or the government. The facts are, as the undersigned counsel have previously said, just what they look like. The appeal of this arrangement was that all involved liked to travel, and not coercion by Wanda or anyone else.

Dated: August 27, 2019

Respectfully submitted,

/s/ Noell Tin

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COUNSEL FOR WANDA GREENE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served the foregoing DEFENDANT'S ADDENDUM TO SENTENCING MEMORANDUM with the Clerk of Court using the CM/ECF system, which will send notification of such filing to opposing counsel:

Richard Edwards
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Dated: August 27, 2019

/s/ Noell P. Tin _____

